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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 YOANDRY BENITEZ-CASTELLANO,  
14 Defendant.  
15

Case No. 2:21-cr-00221-JCM-BNW-1

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Jean Ripley, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,  
20 Assistant Federal Public Defender, counsel for Yoandry Benitez-Castellano, that the  
21 Revocation Hearing currently scheduled on November 18, 2022, at 10:30 am, be vacated and  
22 continued to December 9, 2022, at 10:00 am.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel for Mr. Benitez will be out of the jurisdiction at a training on  
25 the currently scheduled hearing date. Defense counsel attempted to have a colleague cover the  
26 matter, but Mr. Benitez felt uneasy going forward with someone other than assigned defense  
counsel. Although the matter has been negotiated and there is a joint sentencing

1 recommendation, the parties do anticipate arguing over whether Mr. Benitez should be granted  
2 a period in which to self-surrender to serve his custodial sentence.

3 2. The government has no opposition to continuing this matter until December 9,  
4 2022. Probation opposes this continuance request.

5 3. The defendant is not in custody and agrees with the need for the continuance.

6 4. The parties agree to the continuance.

7 This is the first request for a continuance of the revocation hearing.

8 DATED this 9<sup>th</sup> day of November, 2022.

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10 RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

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12 By /s/ Joy Chen

By /s/ Jean Ripley

13 JOY CHEN  
14 Assistant Federal Public Defender

JEAN RIPLEY  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 YOANDRY BENITEZ-CASTELLANO,

7 Defendant.  
8

Case No. 2:21-cr-00221-JCM-BNW-1

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled  
11 for Friday, November 18, 2022 at 10:30 a.m., be vacated and continued to **December 9,**  
12 **2022, at 10:00 a.m.**

13 DATED November 10, 2022.

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16 UNITED STATES DISTRICT JUDGE  
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